RD AN No. <u>3556</u> (1942-G) May 24, 2000

SUBJECT: Rural Business Enterprise Grant Program

Clarification of Indirect Costs

TO: State Directors, Rural Development

ATTN: Business Programs Directors

PURPOSE/INTENDED OUTCOME:

The purpose of this Administrative Notice (AN) is to provide additional guidance on indirect cost rate proposals as they relate to the Rural Business Enterprise Grant (RBEG) program.

COMPARISON WITH PREVIOUS AN:

There is no previous AN on this subject.

<u>IMPLEMENTATION RESPONSIBILITIES</u>:

Guidance on indirect cost rate proposals can be found in the following Office of Management and Budget (OMB) circulars:

- OMB Circular A-21, "Cost Principles for Education Institutions"
- OMB Circular A-87, "Cost Principles for State, Local, and Indian Tribal Governments"
- OMB Circular A-122, "Cost Principles for Non- Profit Organizations"

OMB Circular A-21 refers to facilities and administrative (F&A) costs throughout the circular. F&A costs are synonymous with indirect costs.

EXPIRATION DATE: FILING INSTRUCTIONS:
May 31, 2001 Preceding RD Instruction 1942-G

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Indirect costs is defined as a cost that has been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective. An indirect cost rate is determined by the cognizant agency. The Federal agency with the largest dollar value of awards with an applicant will be designated the cognizant agency and responsible for negotiating and approving indirect cost rates. For example, an applicant has a grant award from the Department of Education for another project totaling \$500,000. The applicant makes an application for a different project with the Rural Business-Cooperative Service (RBS), and a grant is awarded for \$50,000. The Department of Education is the cognizant agency in this scenario, because they have the most dollar value of awards with the applicant. The key thing to remember is the total dollar value of all Federal awards for the applicant and not just the individual project. If no other Federal agency makes grant awards to the applicant, then RBS is the cognizant agency.

Some organizations already have approved indirect cost rates negotiated by their cognizant agency when they submit applications to RBS. Rural Development State Offices may feel the indirect cost rates are too high for this Agency's portion of a project. If so, the State Office should contact the cognizant agency and ask that agency to negotiate with the applicant for a lower indirect cost rate on our portion of the project.

If RBS is the cognizant agency, the State Office should submit the indirect cost rate proposal to the Specialty Lenders Division (SLD). The National Office has an agreement with the Food Safety and Inspection Service (FSIS) to determine indirect cost rates for the RBEG program. FSIS will work closely with the applicant in negotiating an indirect cost rate. Indirect cost rate determinations cover 1 fiscal year. Therefore, if the grant award is for more than 1 fiscal year, the rate must be re-negotiated for the next fiscal year. Any indirect cost rate that needs to be re-negotiated should be submitted to the SLD.

SUMMARY:

The RBEG program is administered by Rural Development in accordance with RD Instruction 1942-G. OMB Circulars A-21, A-87, and A-122 provide guidelines regarding indirect cost rate proposals for grants. The State Office is responsible for assuring the requirements of RD Instruction 1942-G and the OMB circulars are adhered to in administering the RBEG program.

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If you have any questions concerning the content of this AN, please call Carole Boyko, Specialty Lenders Division, (202) 720-0661.

(Signed by Wilbur T. Peer) for

DAYTON J. WATKINS Administrator Rural Business-Cooperative Service